



Child Care Financial Assistance Policy Advisory

To: Subsidy Administrators
From: Tyreese Nicolas, Deputy Commissioner for Family Access and Engagement
Date: 6/29/2023
Subject: Use of Expired Identification Documents; Income Statement Time Period; Third Party Verification Forms

This advisory is to inform subsidy administrators that EEC has made the following changes to its financial assistance policy, effective immediately:

1. **Expired identification documents may be accepted as proof of identity.** (*See EEC Financial Assistance Policy Guide, Chapter 3.4.*)

EEC regulations and the EEC Financial Assistance Policy Guide state that each parent applying for child care financial assistance must submit documentation of their identity that is “original, valid, and unexpired.”¹ In many of the cases on which EEC has advised in recent months there has been no doubt as to the identity of the parent but the parent has only been able to provide an expired identification document, such as a passport. While it is essential to verify the identity of parents, requiring an unexpired document is unnecessary and leads to delays and denials in care for otherwise eligible children could being denied care. Additionally, there is no federal or state law requirement that documents used to prove identity be unexpired.

For those reasons, EEC is exercising its discretion to waive the requirement that documents used to verify the identity of a parent applying for child care financial assistance be unexpired at the time of submission. Subsidy administrators should accept an expired document as proof of identity if the document is otherwise sufficient to establish a parent’s identity regardless of when the document expired.

2. **Applicants may provide pay information from 4 out of the most recent 12 weeks preceding their application.** (*See EEC Financial Assistance Policy Guide, Chapter 4.2.C.1.*)

Per EEC policy, parents applying for income eligible child care financial assistance are required to submit documentation verifying their income.² With some exceptions, this documentation generally must show proof of income from 4 out of the most recent 6 weeks. While federal and state regulations require EEC to verify an applicant’s income, they do not impose specific documentation requirements or time limits.

¹ 606 CMR 10.03(1)(b) and EEC Financial Assistance Policy Guide, Chapter 3.4.

² EEC Financial Assistance Policy Guide, Chapter 4.2.C.1.

EEC also has been made aware of instances where this 6-week time limit has inadvertently led to challenges in processing a financial assistance application, even where a parent is otherwise able to show sufficient proof of income.

Because the 6-week time limit is not required by federal or state law and to ensure that applicants do not face unnecessary hurdles throughout the application process, EEC is exercising its discretion to extend the period from which applicants must provide documentation of income from 6 weeks to 12 weeks. Accordingly, any reference in Chapter 4.2.C.1 of the EEC Financial Assistance Policy Guide that asks for documentation from “4 out of the most recent 6 weeks” should now read as “4 out of the most recent 12 weeks”.

3. Third Party Verification Forms should be interpreted as self-attestations. (*See EEC Financial Assistance Policy Guide, Chapter 3.3, and EEC Financial Assistance Procedures Manual for Subsidy Administrators, Chapter 1.1.*)

EEC policy requires child care financial assistance applicants to submit documentation regarding family composition and size.³ Occasionally, there may be a discrepancy between the family composition indicated by an applicant and the family composition indicated by various forms of documentation. In these cases, EEC permits an applicant to submit a Third Party Verification Form, which allows a third party to verify the household members claimed by an applicant.⁴

While the Third-Party Verification Form was intended to provide greater flexibility for applicants, in practice it has created unnecessary confusion. EEC will therefore be phasing out the Third-Party Verification Form and replacing it with a self-attestation. This transition to a self-attestation is ongoing, though, and subsidy administrators may still encounter Third Party Verification Forms. Any outstanding Third-Party Verification Forms should now be interpreted as self-attestations by applicants regarding their family composition and accepted without further outreach to any third party listed on the form.

³ EEC Financial Assistance Policy Guide, Chapter 3.3.

⁴ EEC Financial Assistance Procedures Manual for Subsidy Administrators, Chapter 1.1.